

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

3 CHRISTOFFER LEE (CABN 280360)
Assistant United States Attorney

4
5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7241
FAX: (415) 436-7234
christoffer.lee@usdoj.gov

8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12
13 UNITED STATES OF AMERICA,) NO. CR-19-00658 JD
14 Plaintiff,)
15 v.) STIPULATION AND REQUEST TO CONVERT
16 SATTAR QURAISH,) AUGUST 12, 2020 PRETRIAL CONFERENCE TO
17 Defendant.) STATUS CONFERENCE AND VACATE
) PRETRIAL CONFERENCE STATEMENT FILING
) REQUIREMENT AND ORDER
18

19 The parties hereby stipulate and jointly request that the Court convert the Pretrial Conference in
20 the above-captioned case, currently set for August 12, 2020 (with Pretrial Conference Statement and
21 disclosure deadlines of August 5, 2020 pursuant to Criminal Local Rule 17.1), to a Status Conference
22 via Zoom, and vacate the current Pretrial Conference deadlines requiring filings and disclosures due on
23 August 5, 2020. For the reasons discussed below, the parties submit there is good cause for the joint
24 request.

25 First, the parties understand that pursuant to General Order 72-5, the Court has vacated all
26 criminal jury trials through September 30, 2020, including the trial in the above-captioned case, which
27
28 STIPULATION AND REQUEST TO CONVERT AUGUST 12, 2020 PRETRIAL CONFERENCE TO
STATUS CONFERENCE AND VACATE PRETRIAL CONFERENCE STATEMENT FILING
REQUIREMENT AND ORDER

1 was set for September 8, 2020. Defense counsel anticipates electing to proceed by jury trial. Given the
 2 uncertainty regarding the next available criminal jury trial slot, the parties anticipate that intervening
 3 events between the currently scheduled Pretrial Conference and the date ultimately selected for the new
 4 jury trial may render moot disclosures, stipulations, witness lists, and pre-trial briefing and motion
 5 practice due next week and necessitate additional pre-trial filings closer in time to the new trial date.

6 Second, the government anticipates filing a superseding indictment alleging additional charges
 7 against Mr. Quraish. The government anticipates producing further discovery. Likewise, the
 8 information, disclosures, and pre-trial briefing and motion practice currently due on August 5, 2020 are
 9 likely subject to revision, amendment and subsequent re-filing. For example, the government's expert
 10 disclosures (and defense expert disclosures or motion practice in response), to the extent based on the
 11 instant indictment, will necessarily require further revision based on the superseding indictment. Thus,
 12 the Pretrial Conference Statement and attendant filing requirements are likely to be rendered moot and
 13 necessitate additional filings and further court review at a later date.

14 Accordingly, the parties stipulate that further trial preparation for both parties and judicial
 15 economy would be served by converting the August 12, 2020 Pretrial Conference to a Status Conference
 16 and vacating the Pretrial Conference Statement filing and disclosure deadlines currently due on August
 17 5, 2020, in light of the vacated September 8, 2020 trial. The parties therefore jointly make the above
 18 request.

19 The undersigned Assistant United States Attorney certifies that he has obtained approval from
 20 counsel for the defendant to file this stipulation and proposed order.

21
 22 IT IS SO STIPULATED.

23 DATED: 7/29/2020

24 _____ /s/
 Christoffer Lee
 Assistant United States Attorney

25 DATED: 7/29/2020

26 _____ /s/
 Elizabeth Falk
 Counsel for Defendant Sattar Quraish

27 STIPULATION AND REQUEST TO CONVERT AUGUST 12, 2020 PRETRIAL CONFERENCE TO
 28 STATUS CONFERENCE AND VACATE PRETRIAL CONFERENCE STATEMENT FILING
 REQUIREMENT AND [PROPOSED] ORDER

ORDER

Based upon the facts set forth in the stipulation of the parties and their joint request, the Court converts the Pretrial Conference previously scheduled for August 12, 2020 at 10:30 a.m. to a Status Conference to be held via Zoom at the same date and time. The Court vacates the Pretrial Conference Statement filing and disclosure requirements currently due on August 5, 2020 given the conversion of the Pretrial Conference to a Status Conference.

IT IS SO ORDERED.

DATED: August 4, 2020

Hon. James Donato
United States District Judge

STIPULATION AND REQUEST TO CONVERT AUGUST 12, 2020 PRETRIAL CONFERENCE TO STATUS CONFERENCE AND VACATE PRETRIAL CONFERENCE STATEMENT FILING REQUIREMENT AND [PROPOSED] ORDER